

APPENDIX B NORTH BEND GRAVEL OPERATION AIR QUALITY TECHNICAL REPORT

Comment 142-004 Asphalt plant table 6 vents fumes into exhaust stacks and the environment.

Response Comment acknowledged.

Comment 073-014 This statement of factual error is contagious and was passed on to Appendix B: Air Quality Technical Report.

Response The air quality analysis is based upon 936 one-way trips for Alternative 2.

Comment 024B-013 Our review was focused on the air quality technical appendix. An overall general comment is that only one significance threshold is used: air pollutant levels that exceed federal, state or regional ambient air quality standards. We believe that a significance threshold that addresses deterioration of ambient air quality should also be addressed (e.g., an emissions based threshold). We understand that the source is not a Prevention of Significant Deterioration (PSD) source. However, the PM₁₀ concentrations predicted through dispersion modeling would exceed the PSD Class II increment. This indicates that the source is a substantial contributor to the deterioration of air quality in the area. We believe that is may be a significant impact. In addition, the State of Washington has a Total Suspended Particulate (TSP) standard, which is set at limits equal to the Federal PM₁₀ standard. In this case, the TSP standard is the more stringent standard, and therefore, more difficult to meet. Why is this standard not addressed? The study states in several parts that most fugitive dust emissions would be comprised of particulates more coarse than PM₁₀. That would indicate that TSP concentrations would be considerably higher than PM₁₀ concentrations, possibly exceeding State standards at the boundary.

Response Given that the source is not a PSD source there is no reason to examine it as if it were. The Puget Sound Clean Air Agency describes TSP as a nuisance not a health risk. The project does not exceed the NAAQS at the site boundaries for PM₁₀. Although TSP emissions would be higher than PM₁₀ emissions, the TSP concentrations would be lower at locations outside the Lower Site because of their lower dispersion potential.

Comment 024B-014 The methodology section was very brief and lacked any detail as to how the air quality analysis was conducted. EPA AP-42 is a voluminous document, containing equations for emission factors for many different activities associated with the project. The factors developed from these equations are highly dependant on assumptions used by the person(s) producing the emissions calculations. The air quality appendix should provided the equations or specific sections of AP-42 along with all assumptions used to develop the emissions. The reasons for making certain assumptions should also be included. For example, what is the silt content, truck activity, etc. used for calculating emissions for Table 3. We would expect to see equations and assumptions for all emissions calculated.

Comment 024B-018 The methodology and assumptions for developing the emissions inventory reported in Table 3 should be provided. Otherwise, the process appears to have been developed using a "black box."

Response

The FEIS Air Quality Technical Report will contain an appendix with the formulas used in the fugitive dust analysis.
